

EXHIBIT A

Appendix A

Change Location / Change Description	Amended Complaint (ECF 22)	Second Amended Complaint (ECF 244)
Additions indicated with double underline: <u>Additions</u> Deletions indicated with strikethrough: Deletions		
Case Caption – Addition	Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC. <u>Defendants.</u>	Amazon.com, Inc.; Apple Inc.; BlackBerry Limited (fka Research In Motion Limited) and BlackBerry Corporation (fka Research In Motion Corporation); <u>DirecTV, LLC</u> ; HTC Corporation and HTC America, Inc.; Huawei Technologies Co., Ltd. and Huawei Device USA, Inc.; Motorola Mobility LLC; Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Telecommunications America, LLC. <u>Defendants</u> <u>and</u> <u>DirecTV, LLC</u> <u>Intervener.</u>
Title	Amended Complaint for Patent Infringement	<u>Second Amended Complaint for Patent Infringement</u>
2nd Am. Compl. at ¶ 17 – Addition	N/A	<u>17. Defendant DirecTV, LLC (“DirecTV”) is a limited liability company with a principal place of business at 2230 E. Imperial Highway, El Segundo, California 90245. DirecTV is doing business and infringing ContentGuard’s DRM patents in the Eastern District of Texas and elsewhere in the United States.</u>
2nd Am.	HTC Corporation HTC America is doing	HTC Corporation is doing business and infringing ContentGuard’s

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Compl. at ¶ 18, Line 3 – Deletion	business and infringing ContentGuard's DRM patents in the Eastern District of Texas and elsewhere in the United States.	DRM patents in the Eastern District of Texas and elsewhere in the United States.
2nd Am. Compl. at ¶ 45 – Addition	N/A	45. <u>ContentGuard has made numerous attempts to negotiate a license agreement with DirecTV. Despite ContentGuard's good-faith efforts,</u> <u>DirecTV has refused to pay for its use of ContentGuard's DRM</u> <u>technologies.</u>
First Am. Compl. at ¶¶ 49-55 ("Defendants' Common Acts of Infringement") – Deletion	<p>DEFENDANTS' COMMON ACTS OF INFRINGEMENT</p> <p>49. Defendants are properly joined in this action because (a) ContentGuard's claims herein are based on the same transaction(s), occurrence(s) or series of transactions or occurrences relating to Defendants' making, using, offering for sale, and selling of the accused products and processes; and (b) questions of fact common to all Defendants will arise in the action.</p> <p>50. For example, all defendants (a) provide access to the Amazon Kindle "app," either preloaded or via their online stores, on one or more of their devices, (b) provide hardware and software components required by the claims of the ContentGuard</p>	N/A

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	<p>DRM patents to enable the Kindle DRM solution to operate on their devices, and/or (c) test the Amazon Kindle “app” to ensure it will work reliably for users of their devices. These devices include, merely by way of example, the Apple iPad, the Amazon Kindle Fire, the BlackBerry Z10, the HTC One Max, the Huawei Ascend, the Motorola Moto X, and the Samsung Galaxy S4. In each of these devices and many other devices supplied by Defendants, the Amazon Kindle “app” is and has been used to practice ContentGuard’s DRM patents.</p> <p>51. In addition, there is a logical relationship and many actual links between the infringement claims against the Defendants arising out of their common use of the Amazon Kindle “app.” Amazon supplies the Kindle “app” that is used by all Defendants and/or their customers to practice the claimed inventions, and the Kindle “app” operates the same way relative to the patents in providing the claimed DRM functionality on Defendants’ products. Moreover, on information and</p>	

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	<p>belief, there are licensing and/or technology agreements between Amazon and the other Defendants in connection with the Kindle “app,” and, on information and belief, Amazon and the other Defendants collaborate in developing, testing, supporting, and/or optimizing the Kindle “app” for the different accused products. These are just a few of the many actual links between the infringement claims against Amazon and the other Defendants indicating that all the Defendants have been properly joined in this action.</p> <p>52. Similarly, on information and belief, each of the Defendants have accused products and methods that use one or more of the Google Play “apps” (Google Play Books, Google Play Movies, and Google Play Music) to practice the claimed inventions. For example, Google Play Books and Google Play Music are available and have been used in accused devices made by each of the Defendants, including, merely by way of example, the Apple iPad, the Amazon Kindle Fire, the</p>	

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	<p>BlackBerry Z10, the HTC One Max, the Huawei Ascend, the Motorola Moto X, and the Samsung Galaxy S4. In each of these devices and many other devices supplied by Defendants, Google Play Books and Google Play Music are and have been used to practice ContentGuard's DRM patents. In addition, Google Play Movies is and has been used to practice ContentGuard's DRM patents on accused devices.</p> <p>53. In addition, there is a logical relationship and many actual links between the infringement claims against the Defendants arising out of their common use of the Google Play "apps". Google supplies the Google Play "apps" that are used by all Defendants to practice the claimed inventions, and the Google Play "apps" operate the same way relative to the patents in providing the claimed DRM functionality on Defendants' products. These are just a few of the many actual links between the infringement claims against the Defendants in relation to the Google Play "apps" indicating that all the Defendants have been properly joined in</p>	

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	<p>this action.</p> <p>54. Similarly, on information and belief, each of the Defendants have accused products and methods that implement one or more versions of a standard known as Unique Identifier Technology Solution or “UITS.” UITS is a specification that describes a way to embed metadata into unprotected media files so that it is possible to detect when the metadata is modified. The UITS specification requires metadata about the content and distributor, and identifiers that distinguish between different purchase events. The metadata is arranged in a standard way and is cryptographically signed so that tampering can be detected. UITS can be used for a number of different purposes, such as communicating the copyright or parental advisory status of a file, verifying retailer sales, transporting redemption codes, and more. Products practicing the UITS specification infringe at least the ’556 patent. Accused devices made by each of the Defendants, including, merely by way of example, the Apple iPad, the Amazon</p>	

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	<p>Kindle Fire, the BlackBerry Z10, the HTC One Max, the Huawei Ascend, the Motorola Moto X, and the Samsung Galaxy S4 practice the UITS specification.</p> <p>55. For these reasons, infringement issues in this case will include for all defendants common questions of fact concerning the Kindle application, the Google Play “apps,” and the UITS specification, resulting in substantial evidentiary overlap with respect to the design and operation of the accused devices, as applied to the claims of the asserted patents.</p>	
2nd Am. Compl., at ¶ 51 – Rewording	56. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	51. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
Am. Compl., at ¶ 60 – Deletion	60. HTC has been and is now directly infringing and/or indirectly infringing the ’859 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one	

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	<p>claim of the '859 Patent. HTC has notice of the '859 Patent. HTC actively induces content providers and/or end users of HTC products to infringe the '859 Patent by, among other things, (a) providing access to certain "apps" (such as the iTunes client, the Amazon Kindle, Amazon Instant Video, and/or Google Play "apps") that use the ContentGuard DRM solution claimed in the '859 Patent, (b) providing instructions for using such "apps"; (c) providing advertisements for using such "apps"; and (d) providing hardware and software components required by the claims of the '859 Patent.4 HTC engages in the foregoing activities because it specifically intends end users of HTC products to use "apps" that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '859 Patent. HTC thereby specifically intends end users and content providers to infringe the '859 Patent. HTC derives revenue from both its own and the third party infringers' infringing activities. Indeed, HTC's ability to sell the accused products is wholly</p>	

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	<u>dependent upon the availability of these “apps” and the digital content they make available to users. HTC also contributorily infringes the ’859 Patent because there is no substantial noninfringing use of these “apps” on the accused HTC products. These “apps” cannot be used with accused HTC products without infringing the ’859 Patent.</u>	
2nd Am. Compl., at ¶ 55 –Addition		<u>55. DirecTV is now directly infringing and/or indirectly infringing the ’859 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the ’859 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the ’859 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the ’859 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertising for such products; and (c) providing hardware and software components required by the claims of the ’859 Patent.⁴ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard</u>

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		<p>DRM solutions claimed in the '859 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '859 Patent. DirecTV derives revenue from both its own and the third-party infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '859 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '859 Patent.</p>
Am. Compl., at 18-19, n.4 – Deletion		
2nd Am. Compl., at 16, n.4 – Addition	⁴ <i>See, e.g.</i> , http://www.htcdev.com/resources/android-basics ; http://www.htc.com/www/smartphones/htc-one-max/#specs ; <u>HTC One Max Manual</u> , available at http://www.gsmarena.com/htc/one-max/manual/ ; http://www.laptopmag.com/reviews/smartphones/htc-one-verizon.aspx ; http://androidandme.com/2011/03/news/htc-merge-pre-loaded-with-the-new-amazon-appstoreheading-to-cellular-south/ ; http://www.engadget.com/2012/11/13/amazon-app-suite-verizon-preloaded-droid-dna/ .	⁴ <i>See, e.g.</i> , https://support.directv.com/app/answers/detail/a_id/2500/~/directv-receiver-manuals ; https://support.directv.com/app/answers/detail/a_id/3669/~/manuals%3A-guides-for-all-yourequipment ; https://support.directv.com/app/answers/detail/a_id/3979/~/directv-hr34%2Fhr44-receiver-%28genie%29 ; http://www.directv.com/technology/dvr_service ; https://support.directv.com/app/answers/detail/a_id/4039/~/how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F ; http://www.directv.com/technology/directv_cinema?AC_M=false&lpos=Header:3 ; http://www.directv.com/technology/on_demand .
2nd Am. Compl., at ¶ 59	64. Paragraphs 1 through 55 are incorporated by reference as if fully stated	59. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.

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– Rewording	herein.	
2nd Am. Compl., at ¶ 63 – Addition	N/A	<p>63. <u>DirecTV is now directly infringing and/or indirectly infringing the '072 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '072 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '072 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the '072 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertising for such products; and (c) providing hardware and software components required by the claims of the '072 Patent.</u>¹¹ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '072 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '072 Patent. DirecTV derives revenue from both its own and the thirdparty infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '072 Patent because there is no substantial non-infringing use of the accused DirecTV products. These products</p>

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		<u>cannot be used without infringing the '072 Patent.</u>
2nd Am. Compl., at 24, n.11 – Addition	N/A	¹¹ <u>See, e.g.,</u> <u>https://support.directv.com/app/answers/detail/a_id/2500/~directv-receiver-manuals;</u> <u>https://support.directv.com/app/answers/detail/a_id/3669/~manuals%3A-guides-for-all-yourequipment;</u> <u>https://support.directv.com/app/answers/detail/a_id/3979/~directv-hr34%2Fhr44-receiver-%28genie%29;</u> <u>http://www.directv.com/technology/dvr_service;</u> <u>https://support.directv.com/app/answers/detail/a_id/4039/~how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F;</u> <u>http://www.directv.com/technology/directv_cinema?ACM=false&lpos=Header:3;</u> <u>http://www.directv.com/technology/on_demand.</u>
2nd Am. Compl., at 29, Count 3 Heading – Change of Accused Parties	COUNT 3: INFRINGEMENT OF THE '280 PATENT (AGAINST APPLE, BLACKBERRY, HTC, HUAWEI, MOTOROLA, AND SAMSUNG)	COUNT 3: INFRINGEMENT OF THE '280 PATENT (AGAINST APPLE, BLACKBERRY, <u>DIRECTV</u>, HTC, HUAWEI, MOTOROLA, AND SAMSUNG)
2nd Am. Compl., at ¶ 68 – Rewording	72. <u>Paragraphs 1 through 55</u> are incorporated by reference as if fully stated herein.	68. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 71	N/A	71. <u>DirectTV is now directly infringing and/or indirectly infringing the '280 Patent by way of inducement and/or contributory infringement.</u>

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– Addition		
		<p>literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '280 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '280 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the '280 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertising for such products; and (c) providing hardware and software components required by the claims of the '280 Patent.¹⁸ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '280 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '280 Patent. DirecTV derives revenue from both its own and the third-party infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '280 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '280 Patent.</p>
2nd Am.	N/A	18 See, e.g.,

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Compl., at 32, n.18 – Addition		<p><u>https://support.directv.com/app/answers/detail/a_id/2500/~/directv-receiver-manuals;</u></p> <p><u>https://support.directv.com/app/answers/detail/a_id/3669/~/manuals%3A-guides-for-all-yourequipment;</u></p> <p><u>https://support.directv.com/app/answers/detail/a_id/3979/~/directv-hr34%2Fhr44-receiver-%28genie%29;</u></p> <p><u>http://www.directv.com/technology/dvr_service;</u></p> <p><u>https://support.directv.com/app/answers/detail/a_id/4039/~/how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F;</u></p> <p><u>http://www.directv.com/technology/directv_cinema?ACM=false&lpos=Header:3;</u></p> <p><u>http://www.directv.com/technology/on_demand.</u></p>
2nd Am. Compl., at ¶ 76 – Rewording	79. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	76. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 83 – Rewording	86. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	83. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 87 – Addition	N/A	87. <u>DirecTV is now directly infringing and/or indirectly infringing the '576 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '576 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '576 Patent. DirecTV actively induces content</u>

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		<p>providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the '576 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertisings for such products; and (c) providing hardware and software components required by the claims of the '576 Patent.³² DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '576 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '576 Patent. DirecTV derives revenue from both its own and the thirdparty infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '576 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '576 Patent.</p>
2nd Am. Compl., at 48, n.32 – Addition	N/A	³² See, e.g., https://support.directv.com/app/answers/detail/a_id/2500/~/directv-receiver-manuals ; https://support.directv.com/app/answers/detail/a_id/3669/~/manuals%3A-guides-for-all-youequipment ; https://support.directv.com/app/answers/detail/a_id/3979/~/directv-hr34%2Fhr44-receiver-%28genie%29 ; http://www.directv.com/technology/dvr_service ;

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		https://support.directv.com/app/answers/detail/a_id/4039/~/how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F; http://www.directv.com/technology/directv_cinema?ACM=false&lpos=Header:3; http://www.directv.com/technology/on_demand .
2nd Am. Compl., at ¶ 92 – Rewording	94. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	92. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 96 – Addition	N/A	96. DirecTV is now directly infringing and/or indirectly infringing the '956 Patent by way of <u>inducement and/or contributory infringement</u> , literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including <u>by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '956 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '956 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the '956 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertising for such products; and (c) providing hardware and software components required by the claims of the '956 Patent.</u> ⁴⁰ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '956 Patent. DirecTV thereby

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		<u>specifically intends end users and content providers to infringe the '956 Patent. DirecTV derives revenue from both its own and the thirdparty infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '956 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '956 Patent.</u>
2nd Am. Compl., at 57, n.40 – Addition	N/A	⁴⁰ <u>See, e.g.,</u> https://support.directv.com/app/answers/detail/a_id/2500/~directv-receiver-manuals ; https://support.directv.com/app/answers/detail/a_id/3669/~manuals%3A-guides-for-all-yourequipment ; https://support.directv.com/app/answers/detail/a_id/3979/~directv-hr34%2Fhr44-receiver-%28genie%29 ; http://www.directv.com/technology/dvr_service ; https://support.directv.com/app/answers/detail/a_id/4039/~how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F ; http://www.directv.com/technology/directv_cinema?ACM=false&lpos=Header:3 ; http://www.directv.com/technology/on_demand .
2nd Am. Compl., at ¶ 101 – Rewording	102. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	101. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am.	N/A	105. DirecTV is now directly infringing and/or indirectly infringing

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Compl., at ¶ 105 – Addition		<p>the '007 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '007 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '007 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs, to infringe the '007 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertisings for such products; and (c) providing hardware and software components required by the claims of the '007 Patent.⁴⁸ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '007 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '007 Patent. DirecTV derives revenue from both its own and the thirdparty infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '007 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '007 Patent.</p>
2nd Am.	N/A	⁴⁸ See, e.g.,

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Compl., at 66, n.48 (re ¶ 65) – Addition		https://support.directv.com/app/answers/detail/a_id/2500/~/directv-receiver-manuals ; https://support.directv.com/app/answers/detail/a_id/3669/~/manuals%3A-guides-for-all-yourequipment ; https://support.directv.com/app/answers/detail/a_id/3979/~/directv-hr34%2Fhr44-receiver-%28genie%29 ; http://www.directv.com/technology/dvr_service ; https://support.directv.com/app/answers/detail/a_id/4039/~/how-do-i-record-shows-on-my-dvrusing-my-remote-control%3F ; http://www.directv.com/technology/directv_cinema?ACM=false&lpos=Header:3 ; http://www.directv.com/technology/on_demand .
2nd Am. Compl., at ¶ 110 – Rewording	110. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	110. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 114 – Addition	N/A	114. DirecTV is now directly infringing and/or indirectly infringing the '160 Patent by way of inducement and/or contributory infringement, literally and/or under the doctrine of equivalents, in this District, and elsewhere, in violation of 35 U.S.C. § 271, including by making, using, selling, and/or offering for sale in the United States or importing into the United States products covered by at least one claim of the '160 Patent, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On Demand programs. DirecTV has notice of the '160 Patent. DirecTV actively induces content providers and/or end users of DirecTV products, including set-top boxes, receivers, DVRs, and DirecTV Cinema and DirecTV On

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		<p>Demand programs, to infringe the '160 Patent by, among other things, (a) providing instructions, manuals, for DirecTV products; (b) providing advertisings for such products; and (c) providing hardware and software components required by the claims of the '160 Patent.⁵⁶ DirecTV engages in the foregoing activities because it specifically intends end users to use the DirecTV products that deploy, and content providers to distribute content that is protected by, the ContentGuard DRM solutions claimed in the '160 Patent. DirecTV thereby specifically intends end users and content providers to infringe the '160 Patent. DirecTV derives revenue from both its own and the thirdparty infringers' infringing activities. Indeed, DirecTV's ability to sell the accused products is wholly dependent upon the availability of the digital content they make available to users. DirecTV also contributorily infringes the '160 Patent because there is no substantial noninfringing use of the accused DirecTV products. These products cannot be used without infringing the '160 Patent.</p>
2nd Am. Compl., at 75, n.56– Addition	N/A	⁵⁶ See, e.g., https://support.directv.com/app/answers/detail/a_id/2500/~/directv-receiver-manuals ; https://support.directv.com/app/answers/detail/a_id/3669/~/manuals%3A-guides-for-all-yourequipment ; https://support.directv.com/app/answers/detail/a_id/3979/~/directv-hr34%2Fhr44-receiver-%28genie%29;http://www.directv.com/technology/dvr_service ; https://support.directv.com/app/answers/detail/a_id/4039/~/how-do-i-record-shows-on-my-dvrusing-my-remote

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		<u>control%3F;http://www.directv.com/technology/directv_cinema?AC</u> <u>M=false&lpos=Header:3;</u> <u>http://www.directv.com/technology/on_demand.</u>
2nd Am. Compl., at 80, Count 9 Heading – Change of Accused Parties	COUNT 9: INFRINGEMENT OF THE '556 PATENT (AGAINST ALL DEFENDANTS)	COUNT 9: INFRINGEMENT OF THE '556 PATENT (AGAINST <u>AMAZON, APPLE, BLACKBERRY, HTC, HUAWEI, MOTOROLA, AND SAMSUNG</u>)
2nd Am. Compl., at ¶ 119 – Rewording	118. Paragraphs 1 through 55 are incorporated by reference as if fully stated herein.	119. <u>The foregoing paragraphs</u> are incorporated by reference as if fully stated herein.
2nd Am. Compl., at ¶ 132 – Addition	N/A	<u>132. A judgment that DirecTV directly and/or indirectly infringes the '859, '072, '280, '576, '956, '007, and '160 patents</u>
2nd Am. Compl., at ¶ 140 – Addition	N/A	<u>140. A permanent injunction preventing DirecTV and its respective officers, directors, agents, servants, employees, attorneys, licensees, successors, and assigns, and those in active concert or participation with any of them, from engaging in infringing activities with respect to the '859, '072, '280, '576, '956, '007, and '160 patents;</u>
2nd Am. Compl., at ¶ 148 – Addition	N/A	<u>148. A judgment that DirecTV's infringement has been willful;</u>